

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ALEXANDRA LOZANO IMMIGRATION LAW,
PLLC,

Plaintiff,

v.

MENESES LAW, PLLC

Defendants.

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Civil Action No. 4:24-cv-2190

**PLAINTIFF’S UNOPPOSED NOTICE OF WITHDRAWAL OF
PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Alexandra Lozano Immigration Law, PLLC (the “Firm” or “ALIL”) hereby respectfully withdraws its pending Motion for Preliminary Injunction [Dkt. 19] (“Motion”). ALIL, in withdrawing the Motion does not waive its right to present evidence and arguments concerning matters set forth in its Motion. In support therefore Plaintiff states as follows:

1. On May 31, 2024, ALIL originally obtained a Temporary Restraining Order against Defendant Meneses Law, PLLC (“Defendant”).
2. On June 7, 2024, along with former defendant Juan Pablo Diaz Cuenca, Defendant removed the matter to this Court.¹
3. On July 26, 2024, after several attempts at conferring over the terms and relief sought in the Motion, ALIL filed its Motion.
4. On August 10, 2024, the Court entered an Agreed Expedited Discovery Order and briefing Schedule [Dkt. 27]. On September 3, 2024, the Court entered an Amended Agreed

¹ On September 9, 2024, ALIL voluntarily dismissed its claims against Mr. Diaz and filed a claim against Mr. Diaz in arbitration, pursuant to the Dispute Resolution Agreement attached to the Original Petition as Exhibit A (Dkt. 1-4). *See* Dkt. 45.

Expedited Discovery Order and Briefing Schedule [Dkt. 43]. For various reasons, the discovery process has experienced delays, causing further pursuit of the Motion to become impractical.

5. No party will be unduly prejudiced by the withdrawal, and no other case deadlines will be impacted by granting the withdrawal.

6. ALIL's counsel contacted Defendant's counsel regarding this Notice, and Defendant is unopposed to the withdrawal of the Motion.

Dated: September 12, 2024

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Pursuant to LR 7.1(D) and the Court's Civil Procedures Rule 7.P, I certify that I conferred with Jason S. McManis, counsel for Meneses Law PLLC, on September 12, 2024, by electronic mail, requesting that Meneses Law PLLC consent to the withdrawal of *Plaintiff's Motion for Preliminary Injunction*. He stated that Meneses Law is unopposed to the withdrawal of the Motion.

/s/ Pamela B. Linberg
Pamela B. Linberg

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of *Plaintiff's Notice of Withdrawal of Plaintiff's Motion for Preliminary Injunction* was served on September 12, 2024 to the following entities:

Via Emails

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